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ATTORNEYS FOR PLAINTIFF
LAIWU STEEL CORPORATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LAIWU STEEL CORPORATION,

Plaintiff,

-against-

AL-FAQIH GENERAL TRADING, a/k/a AL-FAQIH
FOR TRADING, a/k/a AL-FAQIH FOR GENERAL
TRADING,

Defendant.

07 CV 11499
07 Civ. _____

JUDGE SAND

**AFFIDAVIT IN
SUPPORT OF ATTACHMENT**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Michael J. Frevola, being duly sworn, deposes and says:

1. I am a member of the firm of Holland & Knight LLP, attorneys for plaintiff Laiwu Steel Corporation ("Plaintiff"), and I am duly admitted to practice before the United States District Court for the Southern District of New York.

2. I am familiar with the facts and circumstances underlying this dispute and I am submitting this affidavit in support of the Verified Complaint and the Writ of Attachment.

3. Defendant Al-Faqih General Trading, a/k/a Al-Faqih for Trading, a/k/a Al-Faqih for General Trading is not listed in the telephone directory of the principal metropolitan areas in this district, nor is it listed in the Transportation Tickler, a recognized commercial directory in the maritime industry.

4. To the best of my information and belief, Defendant Al-Faqih General Trading, a/k/a Al-Faqih for Trading, a/k/a Al-Faqih for General Trading cannot be found within this district or within the State of New York.

5. Our office contacted the Secretary of State for the State of New York and was advised that Defendant Al-Faqih General Trading, a/k/a Al-Faqih for Trading, a/k/a Al-Faqih for General Trading is neither a New York business entity, nor was it a foreign business entity authorized to do business in New York.

6. Based upon the facts set forth in the Verified Complaint, I respectfully submit that the Defendant Al-Faqih General Trading, a/k/a Al-Faqih for Trading, a/k/a Al-Faqih for General Trading is liable to Plaintiff for the damages alleged in the Verified Complaint, which amounts, as best as can be presently determined, amount to a total of US\$7,078,183.88, including estimated interest.

7. Upon information and belief, Defendant Al-Faqih General Trading, a/k/a Al-Faqih for Trading, a/k/a Al-Faqih for General Trading has property, goods, chattels or effects

within this jurisdiction, to wit: funds or accounts held in the name of Al-Faqih General Trading at one or more of the following financial institutions:

Bank of America, N.A.
Bank of China
The Bank of New York
Citibank, N.A.
Deutsche Bank Trust Company Americas
HSBC Bank USA, N.A.
JPMorgan Chase Bank, N.A.
UBS AG
Wachovia Bank, N.A.
Société Générale
Standard Chartered Bank
BNP Paribas
Calyon Investment Bank
American Express Bank
Commerzbank
ABN Amro Bank
Bank Leumi USA
Banco Popular
China Trust Bank
Great Eastern Bank
Industrial Bank of Korea
Nara Bank
Shin Han Bank
United Orient Bank

8. Plaintiff is, therefore, requesting that this Court, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, issue a writ of maritime attachment for an amount up to \$7,078,183.88.

WHEREFORE, Plaintiff respectfully requests that the application for a writ of maritime attachment and garnishment be granted.



Michael J. Frevola

Sworn to before me this
21st day of December, 2007



Notary Public

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Elvin Ramos
Notary Public, State of New York
NO. 01RA4870243
Qualified in Queens County
Certificate filed in New York County
Commission Expires September 2, 2010